

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

**NOTICE OF MOTION TO  
ADJOURN SENTENCING**

Case No. 17-CR-00190

vs.

G. STEVEN PIGEON,

Defendant.

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S I R S :

COMES NOW the defendant, G. STEVEN PIGEON, by and through his attorneys, LIPSITZ GREEN SCIME CAMBRIA LLP, PAUL J. CAMBRIA, JR., ESQ., and JUSTIN D. GINTER, ESQ., and upon the annexed affidavit of Justin D. Ginter, Esq., the undersigned moves this court for an order adjourning Mr. Pigeon's sentencing date currently scheduled for May 24, 2022 for approximately sixty (60) days for reasons set forth in the affidavit annexed hereto and made a part hereof together with such other and further relief as to this Court may deem just and proper.

DATED: Buffalo, New York  
May 3, 2022

Respectfully submitted,

LIPSITZ GREEN SCIME CAMBRIA LLP  
PAUL J. CAMBRIA, JR., ESQ.  
JUSTIN D. GINTER, ESQ.  
Attorneys for Defendant, G. STEVEN PIGEON  
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TO: PAUL E. BONANNO, ESQ.  
Assistant United States Attorney  
138 Delaware Ave.  
Buffalo, NY 14202

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**AFFIDAVIT**  
Case No. 17-CR-00190

JUSTIN D. GINTER, ESQ., being duly sworn, deposes and says:

- 1) I, along with Paul J. Cambria, Jr., Esq. represent the defendant, G. Steven Pigeon.
- 2) Mr. Pigeon's sentencing is currently scheduled for May 24 2022. Defense is respectfully requesting a sixty (60) day adjournment of Mr. Pigeon's sentencing.
- 3) On December 1, 2021, the defense was notified that an Erie County Grand Jury had returned a sealed indictment against Mr. Pigeon.
- 4) On December 2, 2021, Mr. Pigeon turned himself in as directed at the New York State Trooper Substation in Clarence, New York. He was subsequently put in custody and brought before Judge Christopher J. Burns. At that time, Judge Burns remanded him to the custody of the Erie County Sheriff, reserving his right to address bail in front of the judge that was ultimately assigned to the case. Subsequently, we

learned that Judge William Boller had been assigned to the case, and a motions is now scheduled for July 1, 2022 before Judge Boller.

5) Defense respectfully requests this adjournment so that they may sort out the facts and circumstances behind these allegations. Mr. Pigeon vehemently denies these allegations, and the defense has not been provided any discovery to this point to support the charges pending against him. Once we are able to review the discovery and have further discussions with the Erie County District Attorney's Office, we will be in a better position to move forward with the sentencing on his matter before Your Honor.

6) Assistant United States Attorney Paul E. Bonanno was contacted, and the Government does not object to this request.

WHEREFORE, for the reasons set forth above, your deponent respectfully requests a sixty (60) day adjournment of Mr. Pigeon's sentencing.

/s/ Justin D. Ginter, Esq.

JUSTIN D. GINTER, ESQ.

Subscribed and sworn to before me this  
3<sup>rd</sup> day of May, 2022.

/s/Kristina Drewery

Commissioner of Deeds

Qualified in Erie County

My Commission Expires December 31, 2022